

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
ETC Annual Reports and Certifications)	WC Docket No. 14-58
)	
Developing a Unified Intercarrier)	CC Docket No. 01-92
Compensation Regime)	
)	

COMMENTS OF DANVILLE MUTUAL TELEPHONE
CHALLENGING COMPETITIVE COVERAGE IN A-CAM MODEL

On March 30, 2016, the FCC released its Order reforming the Universal Support Fund (USF) regime for rural local exchange carriers (RLECs).¹ One provision of the USF Reform Order was the creation of an alternative, incentive-based support mechanism, utilizing a “forward-looking, efficient mechanism [and] model-based support.”²

That Alternative Connect America Model (A-CAM) “excludes from support calculations those census blocks that are presumed to be served by an unsubsidized competitor.”³ The Order acknowledges that filed Form 477 data may not be accurate, however, so establishes a challenge process for “commenters to challenge the competitive coverage contained in the updated version of the model.”⁴

On April 7, the Wireline Competition Bureau (WCB) released a public notice commencing that challenge process.⁵ Accordingly, Danville Mutual Telephone (Danville), an RLEC serving

¹ Report and Order FCC 16-33, hereafter referred to as the “USF reform order.” Accessed at https://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0330/FCC-16-33A1.pdf.

² USF Reform Order, ¶14.

³ USF Reform Order, ¶159.

⁴ USF Reform Order, ¶171.

⁵ Public Notice DA 16-378. Accessed at http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0407/DA-16-378A1.pdf.

southeastern Iowa, is challenging model assumptions regarding competitive coverage within the Danville study area (351147), specifically census block 190570012001011.

There is not an unsubsidized competitor offering qualifying service within census block 190570012001011. Recently-released June 2015 Form 477 data does identify a wireline provider (Mediacom) claiming to offer qualifying broadband speeds,⁶ but additional evidence disputes that information.

Attachment A is an affidavit from Dusty Johnson of Vantage Point Solutions. Mr. Johnson gathered information related to availability of Mediacom service within the Danville study area. Publicly-available information contained within that attachment (as well as attachment B) indicates Mediacom does not provide qualifying broadband service within census block 190570012001011. Additionally, the June 2015 Form 477 data identifies no other unsubsidized competitor claiming to offer broadband service in that area.⁷

Accordingly, Danville Mutual Telephone respectfully requests that census block 190570012001011 be made eligible for model funding in the next run of the A-CAM.

Respectfully submitted,
By: /s/ Tim Fencil
General Manager
Danville Mutual Telephone
102 S Main Street
Danville, IA 52623

⁶ Form 477 data accessed at
<https://www.fcc.gov/form477/BroadbandData/Fixed/Jun15/Version%202/IA-Fixed-Jun2015.zip>.

⁷ Form 477 data accessed at
<https://www.fcc.gov/form477/BroadbandData/Fixed/Jun15/Version%202/IA-Fixed-Jun2015.zip>.

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AFFIDAVIT OF DUSTIN JOHNSON

I, Dustin Johnson, attest that my statements are true to the best of my knowledge.

1. My name is Dustin "Dusty" Johnson. I am the Vice President of Consulting for Vantage Point Solutions. My business address is 2211 N. Minnesota Street in Mitchell, SD 57301.
2. During the morning of April 28, 2016, I used Google Maps to identify the addresses of all locations visible within census block 190570012001011.
3. I used the U.S. Census Bureau website
(<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t>) to verify that the addresses I had gathered were located within census block 190570012001011.
4. I then utilized the Mediacom service availability interface, accessible at www.mediacomcable.com. I used that tool to enter in each address I had identified within census block 190570012001011. In every instance I was informed that the address could not be found or that Mediacom did not offer service at that location.

5. I have attached a screen shot of one of the results I received after entering in the address information for one location. The results page stated "We are sorry, but Mediacom does not provide service to this address." I have labeled this as "attachment B."
6. This completes my affidavit.



Dustin Johnson

Vice President of Consulting

Vantage Point Solutions

Subscribed and sworn to before me, this

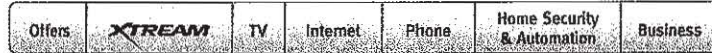
28th day of April, 2016.

June C. Thompson
June C. Thompson (Printed Name)

Notary Public, Davison County, South Dakota

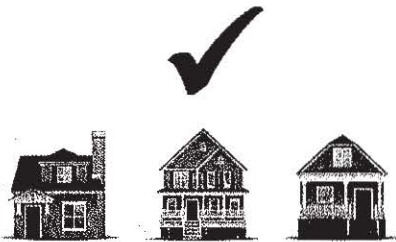
Acting in the County of Davison

My Commission Expires: Sept 24, 2020

Mediacom

**We are sorry but Mediacom
does not provide service
to this address.**

Please visit CableMover.com or call
1-866-620-0640 to find the cable
company serving your area.



**check service availability
in your area**

* Street Address:

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+ Zip Code:

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